

EXHIBIT J

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA**

RYSTA LEONA SUSMAN, both individually
and as Legal Guardian of Shane Allen
Loveland, and JACOB SUMMERS,

Plaintiffs,

v.

THE GOODYEAR TIRE & RUBBER
COMPANY,

Defendant.

Case No. 8:18CV127

**DECLARATION OF JAY LAWRENCE
IN SUPPORT OF GOODYEAR'S BRIEF
IN OPPOSITION TO PLAINTIFFS'
MOTION FOR SUMMARY JUDGMENT**

I, Jay K. Lawrence, being duly sworn, states as follows:

1. The testimony herein is based on my own personal knowledge, and the facts stated herein are true and correct to the best of my knowledge and belief. I make this declaration in support of The Goodyear Tire & Rubber Company's Brief in Opposition to Plaintiffs' Motion for Summary Judgment.

2. I was previously employed by The Goodyear Tire & Rubber Company ("Goodyear") as manager of the Product Analysis Group. From 1976 to 2019, I was employed by Goodyear in various capacities involving tire technology, engineering, and design. During my employment at Goodyear, I gained experience and became familiar with the complete line of Goodyear products, including LT235/85R16 Goodyear Wrangler HT tires. Before I worked for Goodyear, I received a Bachelor of Science Degree in Mechanical Engineering from the University of Akron.

3. Industry data indicates that the vast majority of tires are out of service within six (6) years of installation and that very few tires remain in service for 10 years or longer.

4. It would not be typical or expected for a 20-year-old tire to be in service.

5. It would not be expected or normal for an automotive service professional to place a 20 year old tire into service, particularly if that professional does not know the service life history of the tire.

6. A reasonable tire manufacturer in Goodyear's position would not expect an automotive service professional to place a 20-year-old tire into service, especially without knowing the tire's service life history.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 30, 2019 in Green, Ohio


Jay Lawrence